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Before the  
Federal Communications Commission  
Washington, D.C. 20554

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MAR 29 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )

TELEPHONE NUMBER )  
PORTABILITY )

CC Docket No. 95-116  
RM-8535

To: The Commission

**JOINT SUPPLEMENTAL COMMENTS OF  
AIRTOUCH PAGING AND  
ARCH COMMUNICATIONS GROUP**

AirTouch Paging<sup>1/</sup> and Arch Communications Group ("Arch"), by their attorneys, hereby jointly submit their comments in response to the Commission's Public Notice, DA 96-358, released March 14, 1996. The Public Notice solicits further comment in the above-captioned docket on the effect of the Telecommunications Act of 1996 (the "Act")<sup>2/</sup> on

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1/ AirTouch Paging is a subsidiary of AirTouch Communications. These Joint Supplemental Comments reflect the views only of the paging subsidiary.

2/ Pub.L. 104-104, 110 Stat. 56 (1996).

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matters in issue in this proceeding.<sup>3/</sup> The following is respectfully shown:

1. Arch and AirTouch Paging already have commented on the unique and substantial difficulties that an interim number portability plan would impose on Commercial Mobile Radio Service ("CMRS") providers, especially on paging providers.<sup>4/</sup> Because of these difficulties, Arch and AirTouch Paging have urged the Commission to take time to implement a well-conceived long-term solution to portability, and not to impose interim portability measures on paging carriers.<sup>5/</sup> These positions have garnered substantial support in the record of this proceeding.<sup>6/</sup>

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<sup>3/</sup> AirTouch Paging and Arch have actively participated in this proceeding to date, having filed initial Comments on September 12, 1995 and Reply Comments on October 12, 1995, in response to the Commission's Notice of Proposed Rulemaking, 10 FCC Rcd 12350 (1995), seeking comment on the prospects for telephone number portability in a competitive telecommunications environment.

<sup>4/</sup> See Joint Comments of AirTouch Paging and Arch at 12-16; Joint Reply Comments of AirTouch Paging and Arch at 8-14.

<sup>5/</sup> See id. at 3, 16.

<sup>6/</sup> See, e.g., Report of the Industry Numbering Committee's Number Portability Workshop; Comments of Personal Communications Industry Association at 9; Paging Network, Inc. at 9; SBC Communications at App. F; Nextel Communications, Inc. at 5; Cincinnati Bell Telephone Company at 7.

2. Relevant provisions of the Act provide statutory support for the approach suggested by Arch and AirTouch Paging. The Act imposes several new duties on telecommunications carriers that are defined as Local Exchange Carriers ("LECs"), including

the duty to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission.

47 U.S.C. § 251(b)(2).<sup>7/</sup> However, the Act generally excludes CMRS providers, including paging companies, from the definition of a LEC:

The term "local exchange carrier" ... does not include a person insofar as such person is engaged in the provision of a commercial mobile service under section 332(c), except to the extent that the Commission finds that such service should be included in the definition of such term.

47 U.S.C. § 153(44). With specific regard to number portability, the record of this proceeding establishes beyond question that the portability of telephone numbers presents special technical and operational issues in a wireless context that have no counterpart in a traditional

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<sup>7/</sup> The Act defines number portability as "the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another." 47 U.S.C. § 153(46).

LEC setting. There is no basis therefore for CMRS to be included within the definition of LEC for portability purposes.<sup>8/</sup> Thus, in accordance with the Act, the rules to be adopted in CC Docket No. 94-54 should not impose number portability requirements on paging companies.

3. Additionally, the legislative history of the Act states that the LEC definition "ensure[s] that the Commission could, if future circumstances warrant, include CMS providers which provide telephone exchange service or exchange access in the definition of 'local exchange carrier'."<sup>9/</sup> Thus, Congress clearly indicated that as of February 1996, when the provisions were enacted, circumstances did not warrant treating CMRS providers as LECs and imposing upon them all duties attendant upon LECs. There is no record that circumstances have changed since then. Consequently, the Commission should heed the intent of Congress and not impose number portability obligations on CMRS providers at this time.

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<sup>8/</sup> It is not clear from the Act whether the Commission must determine that a CMRS provider is a LEC for all purposes, or whether the Commission may make such a determination on a case-by-case basis. These questions should appropriately be resolved by additional legislative guidance, or, at a minimum, in a notice and comment proceeding.

<sup>9/</sup> Conference Report on S. 652, Congressional Record, January 31, 1996, at H1108 (emphasis added).

WHEREFORE, the foregoing duly considered, AirTouch  
Paging and Arch Communications Group respectfully request  
that the Commission adopt rules in this proceeding  
consistent with the foregoing.

Respectfully submitted,

**AIRTOUCH PAGING**

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